Socha, Julianne

From: Heacock, Dan [Dan.Heacock@Illinois.gov]

Sent: Monday, March 18, 2013 5:30 PM

To: Socha, Julianne

Subject: FW: Revised SOP for CAFO Permit applications

Attachments: SOP for Applications9-26-2012 modded FEB 1-2012stylesfixcopytoR5 6-11 pmrecovery -

03-18-2013.doc; APP CAFO.PDF; CAFO Permit App Timeline SOPmodded 9-24-2012sent to

r5-7-18-2012-9-26-2012-3-18-2013.xlsx

Julianne:

The response to your comments are below in bold. I have attached a revised SOP. The changes to the SOP and the timeline spreadsheet are identified below. I have also attached the missing form letter and revised timeline spreadsheet.

Let me know when the SOP is approved.

Comments and/or Inconsistencies that need to be addressed prior to EPA approval or approval with modifications:

- 1. Page 4-9, Public Comments Received, Individual Permit Comments during 15 day, two NOIs: The final permit action should be completed by day 370, however, according to timeline for an Individual Permit with Two NOIs the final permit action should be completed by day 360. Please correct this discrepancy. I changed the timeline on the spreadsheet to 370 days. Attached
- 2. Please review the number of days provided in Days column under the Public Hearing and Hold Hearing heading for a hearing associated with an individual permit. In most cases, the number of days provided is prior to the due date which the permit writer is to submit all documents to Unit Manager for final review. For example, on page 4-8 under the Public Comments Received heading for an individual permit with comments during the 15 day notice and one NOI the permit writer is to prepare the final package for Unit Manager review including "if any requests for a public hearing are made, forward any such requests to the Unit Manager, including a recommendation ..." during days 236-280; however, on page 4-10 under the heading Public Hearing and Hold Hearing the permit writer is to provide information to hearing officer as needed and prepare for hearing on days 241-270. Please confirm that if a public hearing is requested the permit writer will be working on an expedited timeline, i.e., the timeline included on page 4-10 and not the timeline on pages 4-8 to 4-9, to make a recommendation to the Unit Manager and submit information to the hearing officer. If it is decided to have a hearing, the permit writer would need to follow the page 4-10 item to provide information to hearing officer in 241-270 days.
- 3. Please review and confirm the number of days provided in the Days column under the heading Permit Denial Public Comments Received for an individual permit no comments during the 15-day notice if two NOIs have been issued. The current SOP establishes that on days 296-320 the permit writer will revise the draft denial letter and prepare documents for unit manager final review. Please review and confirm whether the number of days established for these actions should be days 281-305 instead of 296-320. This item was changed to 281-310 days instead of 296-320. Note also that on page 4-19 changed under Permit Denial No Public Comments received for Individual Permit no 15 day comments, changed 224-30 to 224-235. Page 4-21 under Permit Denial Public Comments Received Unit Manager etc Individual Permit No Comments on 15 day changed 321-335 to 311-325. Also changed Permit Denial Public Comments Received Permit Writer Individual Permit Comments on 15 day from 321-350 to 306-335. Also changed Permit Denial

Public Comments Received Unit Manager etc Individual Permit Comments on 15 day from 351-365 to 336-350

4. Page 4-22 in the SOP identifies the form letters included as Appendix C to the SOP. Seventeen letters are identified, however, only sixteen letters are included. Please review and confirm that all form letters are included in the SOP. Attached the letter APPLICANT NOTICE PROPOSED GENERAL PERMIT COVERAGE.

Minor Inconsistencies or Typographic Errors

- 5. Add Appendix F to list of appendices in Table of Contents. **ADDED**
- 6. Title for appendices B and C in Table of Contents are switched; Appendix B should be Application Forms and Appendix C should be Form Letters **FIXED Table of Contents**
- 7. Section 4 Title on page 4-1 is not the same as the title included in the Table of Contents. **FIXED Table of Contents**
- 8. Please verify the location of the box for "public notice 15 day comments" on the timeline for Individual Permit CAFO Timeline Complete Application is located at day 115. **FIXED Timeline on spreadsheet.**Attached
- 9. Typo on page 4-4, days 31-37 row, steps column, last bullet: "initial fee letter" rather than "initial feed letter" **FIXED**

From: Socha, Julianne [mailto:socha.julianne@epa.gov]

Sent: Friday, March 08, 2013 11:52 AM

To: Heacock, Dan

Subject: RE: Revised SOP for CAFO Permit applications

Hi Dan,

I have completed reviewing the revised SOP. There are just a few matters that need to be addressed before EPA can approve or approve with modifications. Please review and address the following. If you make any changes to the February 1 version of the SOP please resubmit a clean version of the SOP for final action by EPA. If you have any questions or would like to discuss these comments please contact me at 312-886-4436. Julianne

Comments and/or Inconsistencies that need to be addressed prior to EPA approval or approval with modifications:

- 1. Page 4-9, Public Comments Received, Individual Permit Comments during 15 day, two NOIs: The final permit action should be completed by day 370, however, according to timeline for an Individual Permit with Two NOIs the final permit action should be completed by day 360. Please correct this discrepancy.
- 2. Please review the number of days provided in Days column under the Public Hearing and Hold Hearing heading for a hearing associated with an individual permit. In most cases, the number of days provided is prior to the due date which the permit writer is to submit all documents to Unit Manager for final review. For example, on page 4-8 under the Public Comments Received heading for an individual permit with comments during the 15 day notice and one NOI the permit writer is to prepare the final package for Unit Manager review including "if any requests for a public hearing are made, forward any such requests to the Unit Manager, including a recommendation ..." during days 236-280; however, on page 4-10 under the heading Public Hearing and Hold Hearing the permit writer is to provide information to hearing officer as needed and prepare for hearing on days 241-270. Please confirm that if a public hearing is requested the permit writer will be working on an expedited timeline, i.e., the timeline included on page 4-10 and not the timeline on pages 4-8 to 4-9, to make a recommendation to the Unit Manager and submit information to the hearing officer.
- 3. Please review and confirm the number of days provided in the Days column under the heading Permit Denial Public Comments Received for an individual permit no comments during the 15-day notice if two NOIs have

been issued. The current SOP establishes that on days 296-320 the permit writer will revise the draft denial letter and prepare documents for unit manager final review. Please review and confirm whether the number of days established for these actions should be days 281-305 instead of 296-320.

4. Page 4-22 in the SOP identifies the form letters included as Appendix C to the SOP. Seventeen letters are identified, however, only sixteen letters are included. Please review and confirm that all form letters are included in the SOP.

Minor Inconsistencies or Typographic Errors

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- 8. Please verify the location of the box for "public notice 15 day comments" on the timeline for Individual Permit CAFO Timeline Complete Application is located at day 115.
- 9. Typo on page 4-4, days 31-37 row, steps column, last bullet: "initial fee letter" rather than "initial feed letter".

From: Heacock, Dan [mailto:Dan.Heacock@Illinois.gov]

Sent: Thursday, February 14, 2013 10:22 AM

To: Socha, Julianne

Subject: RE: Revised SOP for CAFO Permit applications

How about 10 am on the 19th?

From: Socha.Julianne@epamail.epa.gov [mailto:Socha.Julianne@epamail.epa.gov]

Sent: Wednesday, February 13, 2013 3:54 PM

To: Heacock, Dan

Subject: Re: Revised SOP for CAFO Permit applications

Hi Dan,

Would you have time on Tuesday, Feb 19 to discuss the SOP? I have a few questions. Anytime before noon or after 2:30 would work best for me.

thanks, julianne

"Heacock, Dan" ---02/01/2013 06:26:57 PM---Please find attached the revised SOP and associated documents based on your comments and our discuss

From: "Heacock, Dan" < Dan. Heacock@Illinois.gov > To: Julianne Socha/R5/USEPA/US@EPA,

Cc: Kevin Pierard/R5/USEPA/US@EPA, Stephen Jann/R5/USEPA/US@EPA, "Sofat, Sanjay" < Sanjay.Sofat@Illinois.gov >

Date: 02/01/2013 06:26 PM

Subject: Revised SOP for CAFO Permit applications

Please find attached the revised SOP and associated documents based on your comments and our discussions. The SOP including Section 5 has been revised. The timelines have been revised. Additional letters are also attached.

If there are comments or the SOP is approved let me know.

Daniel L. Heacock, P. E.
Manager, Facility Evaluation Unit
Permit Section
Division of Water Pollution Control
Illinois Environmental Protection Agency
1021 N. Grand Ave. East
Springfield, IL 62794-9276

ph. no. 217/782-3362 fax no. 217/785-1225

email: Dan.Heacock@illinois.gov

[attachment "CAFO Permit App Timeline SOPmodded 9-24-2012sent to r5-7-18-2012-9-26-2012-1-31-2013.xlsx" deleted by Julianne Socha/R5/USEPA/US] [attachment "NPDES form 1.pdf" deleted by Julianne Socha/R5/USEPA/US] [attachment "COE CAFO.PDF" deleted by Julianne Socha/R5/USEPA/US] [attachment "FINAL GENERAL" PERMIT COVERAGE LETTER.PDF" deleted by Julianne Socha/R5/USEPA/US] [attachment "FWS CAFO.PDF" deleted by Julianne Socha/R5/USEPA/US] [attachment "INCOMPLETE CAFO Letter.pdf" deleted by Julianne Socha/R5/USEPA/US] [attachment "NPDES form2b.pdf" deleted by Julianne Socha/R5/USEPA/US] [attachment "USEPA NO REVIEW NOTICE INDIVIDUAL PERMIT.pdf" deleted by Julianne Socha/R5/USEPA/US] [attachment "ADJACENT STATE 30 DAY NOTICE INDIVIDUAL PERMIT.pdf" deleted by Julianne Socha/R5/USEPA/US] [attachment "APPLICANT 15 DAY NOTICE INDIVIDUAL PERMIT.pdf" deleted by Julianne Socha/R5/USEPA/US] [attachment "APPLICANT 30 DAY PUBLIC NOTICE INDIVIDUAL PERMIT.pdf" deleted by Julianne Socha/R5/USEPA/US] [attachment "APPLICANT FINAL INDIVIDUAL PERMIT .pdf" deleted by Julianne Socha/R5/USEPA/US] [attachment "COE 15 DAY NOTICE INDIVIDUAL PERMIT.pdf" deleted by Julianne Socha/R5/USEPA/US] [attachment "FOS MEMORANDUM 15 DAY NOTICE INDVIDUAL PERMIT.pdf" deleted by Julianne Socha/R5/USEPA/US] [attachment "INITIAL FEE LETTER INDIVIDUAL PERMIT.pdf" deleted by Julianne Socha/R5/USEPA/US] [attachment "MODIFICATION WITHOUT PUBLIC NOTICE INDIVIDUAL PERMIT.pdf" deleted by Julianne Socha/R5/USEPA/US] [attachment "MUNICIPAL CLERK 30 DAY NOTICE INDIVIDUAL PERMIT.pdf" deleted by Julianne Socha/R5/USEPA/US] [attachment "US FISH AND WILDLIFE SERVICE 30 DAY NOTICE INDIVIDUAL PERMIT.pdf" deleted by Julianne Socha/R5/USEPA/US] [attachment "USEPA COMMENT LETTER 45 DAY NOTICE INDIVIDUAL PERMIT.pdf" deleted by Julianne Socha/R5/USEPA/US] [attachment "SOP for Applications9-26-2012 modded FEB 1-2012stylesfixcopytoR5 6-11 pmrecovery.doc" deleted by Julianne Socha/R5/USEPA/US]